

**SEALED**

**21-CR-241**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT  
EASTERN DISTRICT - WI  
FILED

2021 NOV 23 P 12:54

UNITED STATES OF AMERICA,

Plaintiff,

Case No.:

v.

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A),  
841(b)(1)(B), 841(b)(1)(C), 846, and 860(a);  
and 18 U.S.C. §§ 922(g)(1), 1956(a)(2)(A),  
1956(h), and 2(a)]

RENE SUAREZ,  
a/k/a "Pelon,"

JAVIER MERCED,  
a/k/a "Voltio,"  
MANUEL REYES-SOTO,  
a/k/a "Chava," "Chavita,"  
SERGIO MALDONADO-CARDONA,  
a/k/a "El Gusano,"  
ARIEL RIVAS-MORALES,  
a/k/a "Pelon," and  
ANNA DOMINGUEZ-HERNANDEZ,

[SEALED]

Defendants.

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. Beginning by at least on or about January 1, 2015, and continuing until on or about the date of this indictment, in the State and Eastern District of Wisconsin and elsewhere,

**RENE SUAREZ,  
a/k/a "Pelon,"**

**JAVIER MERCED,  
a/k/a "Voltio,"**

**MANUEL REYES-SOTO,  
a/k/a "Chava," "Chavita,"  
SERGIO MALDONADO-CARDONA,  
a/k/a "El Gusano,"  
ARIEL RIVAS-MORALES,  
a/k/a "Pelon," and  
ANNA DOMINGUEZ-HERNANDEZ**

knowingly and intentionally conspired with each other, and with other persons known and unknown to the Grand Jury, to possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. With respect to defendants \_\_\_\_\_, RENE SUAREZ, a/k/a "Pelon," MANUEL REYES-SOTO, a/k/a "Chava," "Chavita," and SERGIO MALDONADO-CARDONA, a/k/a "El Gusano," the amount of controlled substance involved in the conspiracy attributable to each defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to each of them, is 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

3. With respect to defendants \_\_\_\_\_, RENE SUAREZ, a/k/a "Pelon," JAVIER MERCED, a/k/a "Voltio," and MANUEL REYES-SOTO, a/k/a "Chava," "Chavita," the amount of controlled substance involved in the conspiracy attributable to each defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to each of them, is 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

4. With respect to defendants JAVIER MERCED, a/k/a "Voltio," ARIEL RIVAS-MORALES, a/k/a "Pelon," and ANNA DOMINGUEZ-HERNANDEZ, the amount of controlled substance involved in the conspiracy attributable to each defendant as a result of his or her own conduct, and the conduct of other conspirators reasonably foreseeable to him or her, is 500 grams

or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A), and 841(b)(1)(B).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning by at least on or about January 1, 2015, and continuing until on or about the date of this indictment, in the State and Eastern District of Wisconsin and elsewhere,

**RENE SUAREZ,  
a/k/a "Pelon,"  
MANUEL REYES-SOTO,  
a/k/a "Chava," "Chavita,"  
SERGIO MALDONADO-CARDONA,  
a/k/a "El Gusano,"  
ARIEL RIVAS-MORALES,  
a/k/a "Pelon," and  
ANNA DOMINGUEZ-HERNANDEZ**

knowingly and intentionally conspired with each other, and with other persons known and unknown to the Grand Jury, to transport, transmit, and transfer monetary instruments from a place in the United States to Mexico, with the intent to promote the carrying on of specified unlawful activity, namely, conspiracy to distribute cocaine and heroin, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

In violation of Title 18, United States Code, Section 1956(h).

**COUNTS THREE AND FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about the following dates, in the State and Eastern District of Wisconsin, the defendant knowingly and intentionally distributed a controlled substance:

COUNT	DEFENDANT	DATE
3		April 30, 2019
4		July 22, 2019

2. Each offense involved a mixture and substance containing a detectable amount heroin, a Schedule I controlled substance.

3. Each offense occurred within 1,000 feet of the real property comprising Saint Matthias Parish School, a private elementary and secondary school.

Each in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860(a).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about May 22, 2019, in the State and Eastern District of Wisconsin,

knowingly and intentionally distributed a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

2. The offense occurred within 1,000 feet of the real property comprising Highland Community School, a public charter elementary and secondary school.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860(a); and Title 18, United States Code, Section 2(a).

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about March 4, 2020, in the State and Eastern District of Wisconsin,

**and**

**JAVIER MERCED,  
a/k/a "Voltio,"**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

2. The offense occurred within 1,000 feet of the real property comprising Saint Gregory the Great Parish School, a private elementary and secondary school.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 860(a); and Title 18, United States Code, Section 2(a).

**COUNTS SEVEN THROUGH ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about the following dates, in the State and Eastern District of Wisconsin, the defendant knowingly and intentionally distributed a controlled substance:

<b>COUNT</b>	<b>DEFENDANT</b>	<b>DATE</b>
<b>7</b>	<b>RENE SUAREZ, a/k/a "Pelon"</b>	<b>December 10, 2020</b>
<b>8</b>	<b>RENE SUAREZ, a/k/a "Pelon"</b>	<b>April 28, 2021</b>
<b>9</b>	<b>RENE SUAREZ, a/k/a "Pelon"</b>	<b>May 27, 2021</b>
<b>10</b>	<b>RENE SUAREZ, a/k/a "Pelon"</b>	<b>June 23, 2021</b>
<b>11</b>	<b>RENE SUAREZ, a/k/a "Pelon"</b>	<b>August 26, 2021</b>

2. Each offense involved 100 grams of a mixture and substance containing a detectable amount heroin, a Schedule I controlled substance.

Each in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(i).

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about September 22, 2021, in the State and Eastern District of Wisconsin,

**JAVIER MERCED,  
a/k/a "Voltio,"**

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate and foreign commerce, the possession of which was therefore in and affecting interstate and foreign commerce.

2. The firearm is more fully described as a Ruger SR40c, .40 caliber semi-automatic pistol, bearing serial no.: 343-12698.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

### **FORFEITURE NOTICE**

1. Upon conviction of the controlled substance offenses in violation of Title 21, United States Code, Sections 841, as charged in Count One and Counts Three through Eleven, each defendant shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations, including but not limited to the following:

- a. approximately \$166,090 in United States currency seized following a traffic stop of a tractor-trailer bearing Nuevo León, Mexico license plate 85AA9L on Interstate 55 in Will County, Illinois, on September 10, 2021;
- b. approximately \$18,284.00 in United States currency seized from the residence of JAVIER MERCED, a/k/a "Voltio," located at 3XXX South 62nd Street, Milwaukee, Wisconsin, on or about September 22, 2021; and
- c. a sum of money equal to the amount of unseized proceeds obtained as a result of the offenses.

2. Upon conviction of the money laundering offense in violation of Title 18, United States Code, Section 1956, as set forth in Count Two of this Indictment, the defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violation and any property involved in the offense, including but not limited to a sum of money equal to the value of the property involved in the offense.

3. Upon conviction of the firearms offense in violation of Title 18, United States Code, Section 922(g)(1), as set forth in Count Twelve of this Indictment, the defendant, JAVIER MERCED, a/k/a "Voltio," shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and

ammunition involved in the offense, including, but not limited to a Ruger SR40c, .40 caliber semi-automatic pistol, bearing Serial Number 343-12698.

4. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOR DEPERSON

Date:

Nov. 23, 2021

  
RICHARD G. FROHLING  
Acting United States Attorney